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March 1, 2024

Hon. Gregory H. Woods,
United States District Court
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007

Re: *Fosun Pharma USA Inc. v. Todos Medical USA, Inc., et al.* Case No. 1:24-cv-00115-GHW

MEMORANDUM ENDORSED

Dear Hon. Judge Woods:

We represent the Plaintiff Fosun Pharma USA Inc. (“Fosun Pharma”). We write to request an adjournment of the initial pre-trial conference, currently set for March 11, 2024, by 30 days, to April 10, 2024. This is Fosun Pharma’s first request for an adjournment, and as the Defendants have neither appeared in the case nor otherwise communicated with Fosun Pharma since the start of this action, we do not know whether they would consent to the present adjournment request.

On January 16, 2024, and January 17, 2024, Fosun Pharma served Defendants Todos Medical USA, Inc. and Corona Diagnostics LLC (the “Defendants”) with the complaint in this action. The deadline for the Defendants to answer the complaint expired on Tuesday, February 6, 2024, and Wednesday, February 7, 2024. Defendants, however, have neither answered the complaint nor otherwise responded to either the complaint or Fosun Pharma’s communications regarding the filing of this lawsuit. Fosun Pharma is in the process of continuing to try to reach the Defendants and elicit their participation in this action.

Under the current schedule, the parties are required to appear for an initial pretrial conference on March 11, 2024, and must submit a joint status letter to the Court by Monday, March 4, 2024. Neither of these tasks can be completed without the Defendants’ participation. As the Defendants have made no effort thus far to defend or in any way to participate in this action, Fosun Pharma respectfully requests that the Court adjourn the initial pretrial conference and associated joint status letter requirement by at least 30 days, to April 10, 2024. This would allow Fosun Pharma time to make a final effort to contact the Defendants and—if such effort proves unsuccessful—to prepare and file a request for entry of default under Fed. R. Civ. P. 55(a) and Attachment A to your Honor’s practice rules.

We thank the Court for its consideration of this request.



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Respectfully submitted,

/s/ Eric Roman


Eric Roman

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Application granted. Plaintiff's request to adjourn the initial pretrial conference, Dkt. No. 36, is granted. The initial pretrial conference scheduled for March 11, 2024 is adjourned to April 10, 2024 at 1:00 p.m. The joint status letter and proposed case management plan described in the Court's January 13, 2024 order are due no later than April 3, 2024. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 36.

SO ORDERED.

Dated: March 1, 2024
New York, New York



GREGORY H. WOODS
United States District Judge